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Christopher C. Cinnamon
Also admitted in Michigan

December 1, 2000

Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 12th St. S.W.
Room TW-B204
Washington, D.C. 20554

**Re: In the Matter of Inquiry Concerning High-Speed Access to the Internet Over
Cable and Other Facilities, GN Docket No. 00-185;
Comments of the American Cable Association ("ACA")**

Dear Ms. Roman Salas:

We electronically filed today ACA's Comments in the above referenced matter. In accordance with paragraph 58 of the Notice of Inquiry, we enclose copies of the comments to be delivered to the following:

- Johanna Mikes, Room 5-C163
- Christopher Libertelli, Room 5-C264
- Carl Kandutsch, Room 3-A832
- Douglas Sicker, Room 7-A325
- Robert Cannon, Room 7-B410 and
- International Transcription Services, CY-B402.

We also ask that you date-stamp the attached copy and return it in the enclosed envelope.

Please call with any questions.

Sincerely,



Christopher C. Cinnamon

Enclosures

cc w/o enc.: Matthew M. Polka
RomanSalas 120100

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Before the
Federal Communications Commission
Washington, D.C. 20554

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Access to the Internet Over)
Cable and Other Facilities)

GN Docket No. 00-185

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December 1, 2000

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SUMMARY

The American Cable Association and its members share a vital interest in this proceeding. ACA members are leading the industry in providing cable modem service to smaller markets and rural areas. To do so, ACA members are making substantial investments in system upgrades and are taking calculated business risks to launch new services. The imposition of burdensome mandated open access regulation presents a serious threat to this progress.

To assist the Commission's inquiry, ACA provides data and analysis to support the following:

- **Impressive progress in smaller markets.** ACA has conducted a comprehensive member survey on deployment of cable modem service. Key highlights of the data include:
 - ACA members surveyed offer cable modem service in systems passing nearly 840,000 homes in smaller markets and rural areas. Current expansion plans will double that number to 1.7 million homes passed within the next 12 to 24 months.
 - ACA members currently serve over 38,000 cable modem customers.
 - Many ACA members provide cable modem service through unaffiliated ISPs.

The principal reason for this progress: The Commission's regulatory restraint has fostered marketplace solutions in smaller markets.

- **Smaller market policy goals.** For smaller markets, the relevant policy goals are: (i) continued rapid deployment of broadband services, and (ii) maintaining a regulatory environment that encourages investment in companies serving these markets. As the ACA Cable Modem Survey data shows, the Commission's emphasis on marketplace solutions has succeeded in smaller markets.
- **Open access concerns do not apply to independent cable.** The policy concerns raised by open access advocates do not apply to markets served by ACA members because:
 - Unaffiliated ISPs already have access to many ACA member systems.
 - ACA members are not vertically integrated content providers and do not present a risk of favoring affiliated content.

SUMMARY (cont.)

- **Cable modem service may not fit existing regulatory categories.** The Commission should resist the results-oriented efforts of various interests to force cable modem service into an existing regulatory category.
- **Cable modem service provided by independent cable companies should remain deregulated.** If the Commission does impose mandated open access regulations on cable modem service, the regulations should include exemptions for cable companies serving smaller markets.

When it comes to deployment of cable modem service in smaller markets and rural areas, ACA members are part of the solution, not part of the problem.

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Cable and Other Facilities)

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Comments of the



I. INTRODUCTION

ACA submits these comments on behalf of 250 independent cable companies. Together, ACA members serve about 2.6 million cable subscribers. ACA members range from small, family-run cable systems to multiple system operators focusing on smaller systems and smaller markets. About half of ACA members serve less than 1,000 subscribers. All ACA members face the challenges of building, operating and upgrading broadband networks in smaller markets and rural areas.

ACA members share a vital interest in this proceeding. Through innovative solutions to technical and business challenges, ACA members are delivering cable modem service to smaller markets. For ACA, the Notice of Inquiry ("NOI") raises a critical question: Will ACA members deploying cable modem service to smaller markets now face the tremendous risk and uncertainty of burdensome regulations?

As demonstrated by the painful experience of cable rate regulation for smaller systems, when it comes to regulating cable, one size does not fit all. In this proceeding, the Commission can help forestall unintended consequences of any future regulation of the cable modem platform or cable modem service. By recognizing the unique circumstances and economic considerations of smaller market providers, the Commission can ensure that the clamor to regulate does not drown out the concerns of independent cable and the smaller markets they serve.

ACA anticipates that the NOI will engender intense debate from powerful and conflicting interest groups. Most of that debate will focus on large companies and major markets. If results of this proceeding convince the Commission that it should consider some measure of regulation, the Commission should act with care to avoid unintended consequences on independent cable companies and the smaller markets they serve.

II. ANALYSIS

ACA's comments focus primarily on the Commission's request for factual information concerning the deployment of cable modem service. We also briefly address policy issues applicable to smaller markets and considerations for resolving the key legal question in the debate – the regulatory classification of cable modem service. We conclude with ACA's answers to three questions raised in Section III.C. of the NOI.

A. Marketplace issues – The ACA Cable Modem Survey.

The NOI seeks to develop a factual record regarding the deployment of cable modem service. ACA has previously provided the Commission with anecdotal reports of ACA members' progress in deploying advanced services in smaller markets.¹ For the inquiry in this docket, ACA wanted to provide the Commission with more complete information concerning ACA members' success in delivering cable modem service. To do so, ACA conducted a comprehensive member survey during November 2000 ("ACA Cable Modem Survey").

The ACA Cable Modem Survey included telephone interviews of 108 member companies. In total, the sample included systems serving more than 1.7 million cable subscribers in 3,400 franchise areas around the United States. Members answered a range of questions concerning their current provision of cable modem service, near-

¹ *In the Matter of Applications of America Online, Inc. and Time Warner Inc. for Transfers of Control*, CS Docket No. 00-30, Comments of the American Cable Association (April 25, 2000), pp. 5-8 (describing progress by ACA members including Mediacom Communications Corporation, Galaxy Cablevision, Pine Tree Cablevision and Rural Route Video in providing cable modem service to smaller markets).

term plans for rolling out or expanding the service, and how regulation of cable modem service in their markets could affect their businesses.

The data fell into three broad categories: (i) companies currently providing cable modem service; (ii) companies planning to launch cable modem service in the next 12 to 24 months; and (iii) companies with no plans to provide cable modem service in the near term. Tables 1 through 3 contain a summary of the ACA Cable Modem Survey results. We provide analysis of the data below.

1. ACA members currently providing cable modem service.²

The ACA Cable Modem Survey provided data on the following aspects of cable modem service currently provided by ACA members:

- Service information - franchise areas, homes passed and customers served.
- Financial considerations - investment required, sources of capital, reasons for making the required investment, and assumptions underlying business models.
- Access to networks by unaffiliated ISPs.
- Near-term expansion plans.

Results of the ACA Cable Modem Survey show significant progress by ACA members in deploying cable modem service in smaller markets.

² See Table 1 for summary of data.

a. Service information.

Of the 108 member companies surveyed, 38 currently offer cable modem service. The systems offering cable modem service pass a total of 839,748 homes. This represents approximately 33% of the total homes passed by ACA members in this group. The companies report a total of 38,647 cable modem customers served as of October 2000.

To put these numbers in context, the ACA members in this group serve approximately 2.5% of the total U.S. cable customers³ and approximately 2.7% of the total U.S. cable modem customers.⁴

b. Financial considerations.

The ACA Cable Modem Survey offers helpful insights into financial considerations involved in upgrading plant and offering cable modem service in smaller markets. The companies in this group report investing an aggregate \$300 million to upgrade their cable systems and obtain equipment for providing cable modem service.

The franchise areas where ACA members offer cable modem service represent 12% of the total number of franchise areas served by the companies, while the number of homes passed represents about 31% of the homes passed by the companies. This

³ Warren Publishing, Inc. U.S. Cable Penetration State by State, Television & Cable Factbook: Cable Volume No. 68, 2000 Edition (reporting about 66 million US cable customers at the end of 1999).

⁴ *In the Matter of Inquiry Concerning of the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996*, CC Docket No. 98-146, Second Report, FCC 00-290 (rel. Aug. 21, 2000), ¶ 189 (estimating 1.41 million U.S. cable modem customers at the end of 1999).

suggests the companies are offering the service in their larger franchise areas first.

The data contains noteworthy exceptions to this observation. Several ACA members report offering cable modem service in communities with less than 1,000 homes, a few in communities with less than 500 homes.

For most of the companies, the capital required to upgrade networks and purchase equipment came from sources typical for smaller business - banks or retained earnings. When asked why they had made the investment to provide cable modem service, most ACA members responded as follows:

- The investment was necessary to remain competitive.
- The investment was necessary to respond to marketplace demands.
- Business models showed that the investment would earn a satisfactory rate of return.

In short, the ACA Cable Modem Survey shows independent cable companies are responding to marketplace incentives, making substantial investments to offer cable modem service in smaller markets, and delivering the service to an increasing number of customers.

c. Access to networks by unaffiliated ISPs.

One aspect of the ACA Cable Modem Survey shows a noteworthy difference in how independent cable companies provide cable modem service: Many ACA members provide cable modem service through agreements with unaffiliated ISPs. ACA members and companies such as High Speed Access, Internet Alliance, InterTECH

and others have negotiated agreements for unaffiliated ISP access to the cable modem platform in smaller markets. In contrast to the activity involving larger companies and larger markets, no ACA member reported that any transaction with an unaffiliated ISP required litigation, lobbying of government officials, or mega-mergers. To the contrary, these agreements arose from business decisions by independent companies to risk capital, transact, and provide an exciting new service.

No ACA member reported denying unaffiliated ISPs access to their cable modem platforms. Many members reported that no ISPs in their service areas expressed interest in negotiating the terms of access to smaller market cable systems.

d. Expansion plans.

The ACA Cable Modem Survey indicated that nearly all member companies currently providing cable modem service plan to expand the service. Within the next 12 to 24 months, these companies plan to expand cable modem service to franchise areas encompassing an additional 824,000 homes passed.

With their expansion plans complete, these ACA members will offer cable modem service to approximately 65% of the homes passed by the companies. For several ACA members in this group, their plans include offering the services to 100% of franchise areas served.

Many ACA members in this group indicated that they would not risk the investment necessary for this expansion if burdensome regulations were imposed on cable modem service in their markets.

2. ACA members planning to deploy cable modem service within 12 to 24 months.⁵

Of 108 companies surveyed, 36 plan to deploy cable modem service within the next 12 to 24 months. The companies in this group currently provide cable service to a total of 69,367 cable customers in 167 franchise areas. Within the next 12 to 24 months, these companies plan to launch cable modem service to systems serving an estimated 54,500 homes passed.

Nearly all ACA members in this group indicated that they would not risk the investment necessary for this expansion if burdensome regulations were imposed on cable modem service in their markets.

3. ACA members not planning to launch cable modem service.⁶

Of 108 companies surveyed, 34 have no plans to offer cable modem service in the next two years. These companies currently serve a total of 59,774 cable customers in 181 franchise areas, less than .01% of cable customers in the U.S.⁷ Several companies in this group are affiliated with small telcos and have opted to provide DSL service.

⁵ See Table 2 for summary of data.

⁶ See Table 3 for summary of data.

⁷ Warren Publishing, Inc. U.S. Cable Penetration State by State, Television & Cable Factbook: Cable Volume No. 68, 2000 Edition (reporting about 66 million US cable customers at the end of 1999).

Reasons given by these companies for not launching the services include:

- Cost.
- Affiliated with a telephone company that offers DSL or dial up services.
- Small customer base cannot support the investment.
- Selling their cable system.

4. The ACA Cable Modem Survey validates the Commission's marketplace approach to broadband deployment in smaller markets.

The ACA Cable Modem Survey shows robust investment in broadband infrastructure in smaller markets. Far from languishing on the wrong side of a digital divide, almost a million customers in these markets have access to cable modem service today. Current expansion plans will double the availability of the cable modem service within 24 months. In some cases, these markets are ahead of broadband deployment in urban centers.

This impressive success begs one question: With the higher costs associated with serving lower density markets, what drives this progress? Commission reports, papers and speeches offer one consistent answer: the absence of burdensome regulation spurs investment in broadband deployment.⁸

⁸ *Broadband Today*, A Staff Report to William E. Kennard, Chairman, Federal Communications Commission, Oct. 1999. ("Broadband Today") 45 ("From the evidence before us and from our independent research, it appears that the prospect of mandated access could have a negative effect on continued investment in broadband technologies and deployment"); Jason Oxman, *The FCC and the Unregulation of the Internet*, (OPP Working Paper Series, No. 31, 1999) ("Oxman") 5 ("The Internet's success can be attributed to several ingredients, but none are as important as the market forces, investment and competition that have driven its growth."); FCC Chairman William Kennard, Remarks before the National Cable Television Association (June 15, 1999) (transcript available at GN Docket No. 00-185
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ACA members agree. ACA members surveyed report developing their business models on the assumption that marketplace forces would govern their provision of cable modem service. Nearly all ACA members currently providing cable modem service indicated they would not risk additional capital at this point if the service were to face burdensome regulations in their markets.

In summary, the ACA Cable Modem Survey shows that the Commission's policy of regulatory restraint and allowing marketplace solutions to develop has worked extremely well in smaller markets.

We now turn to policy questions raised in the NOI.

www.fcc.gov/Speeches/Kennard) ("We decided to let market forces churn while we carefully monitor the situation, and the marketplace responded. The amount of investment in broadband and the number of deals concerning it over the past four months have been staggering - not just in cable.").

B. Policy issues - cable modem service in smaller markets.

1. Policy goals applicable to cable modem service in smaller markets.

The NOI seeks comment on the policy goals that should guide the Commission's inquiry. In smaller markets, two straightforward and often repeated policy goals apply:

- The rapid development of advanced services.⁹
- A regulatory environment that accommodates the unique burdens and costs of independent cable businesses serving smaller markets.¹⁰

The Commission's market based approach to the cable modem platform has facilitated these goals in smaller markets. The ACA Cable Modem Survey shows members are making substantial progress in deploying cable modem service. Many companies have done so through negotiated agreements with unaffiliated ISPs. Little of this progress would have occurred under burdensome regulatory regimes like those advocated by some local franchise authorities, certain ISPs, and incumbent telcos.

⁹ Telecommunications Act of 1996 § 702 Advanced Telecommunications Incentives; *Deployment of Advanced Telecommunications Capability: Second Report*, CC Docket No. 98-146, FCC 00-290 (released August 21, 2000).

¹⁰ See Cable Television Competition and Consumer Protection Act of 1992, §3(i) (codified at 47 USC § 543(i) ("In developing and prescribing regulations pursuant to this section, the Commission shall design such regulations to reduce the administrative burdens and cost of compliance for cable systems that have 1,000 or fewer subscribers."); 1996 Telecommunications Act § 301(c) (codified at 47 USC § 543(m)) (providing greater deregulation for small systems); for a summary of Commission efforts in the context of small system rate regulation, see *Sixth Report and Order and Eleventh Order on Reconsideration*, 10 FCC Rcd 7393, at 7401-7402 and 7420(1995); for special small cable leased access rules, see *Second Report and Order and Second Order on Reconsideration*, 12 FCC Rcd 5267 at 5331-5332, 5333 (1997).

2. Policy issues that may arise in larger markets and larger companies do not apply to smaller markets.

A range of policy positions have surfaced during the open access debate.

Principal themes include: fostering consumer choice, preventing market dominance by cable operators to the detriment of unaffiliated ISPs, and preventing discrimination against unaffiliated content. ACA defers to NCTA and others to debate the merits of these policy positions. That said, the data collected in the ACA Cable Modem Survey suggests one clear distinction - these policy issues do not involve independent cable companies and smaller markets. The delivery of cable modem service by ACA members does not present the perceived threats underlying these policy positions.

The provision of cable modem service by ACA members in smaller markets does not impede consumer choice in broadband Internet access.

The efforts of ACA members are providing hundreds of thousands of consumers the option of high-speed cable modem service in smaller markets. The number of homes passed by ACA members surveyed should exceed 1.7 million within 24 months. Other facilities-based providers have chosen not to invest in these markets. In this way, ACA members deliver a choice of broadband Internet access where none would otherwise exist. With some exceptions, most ISPs have shown no interest in serving smaller markets and in negotiating access to the cable modem platform. Emerging competition from satellite delivered Internet access should add to consumer choice in even the smallest markets.¹¹

¹¹ Oxman, 20. ("Numerous satellite providers are planning to enter the broadband residential
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The provision of cable modem service by ACA members in smaller markets has not resulted in market dominance to the detriment of unaffiliated ISPs.

ACA members report providing cable modem service to 38,647 customers in systems passing 839,748 homes, a penetration level of less than 5%. By no measure does this suggest market dominance. Moreover, many ACA members report providing cable modem service through transactions with unaffiliated ISPs. While the mandated open access debate has rages in larger markets, in smaller markets ACA members and unaffiliated ISPs work together without the hoopla. Finally, with the limited exception of ISPs that specialize in partnering with independent cable companies, ACA members report that unaffiliated ISPs show no interest in negotiating access to their systems.

The provision of cable modem service by ACA members in smaller markets presents no risk of discrimination against unaffiliated content.

ACA members are in the business of operating broadband networks in smaller markets and rural areas. They have few, if any, business interests in programming or content development. The issues raised in the AOL Time Warner merger by content providers like Disney do not apply.

In summary, ACA defers to NCTA and others to address policy issues applicable to larger markets and larger companies. For the markets served by ACA members, the fundamental policy goals remain the rapid deployment of advanced services and a regulatory environment that encourages investment in smaller market providers. The Commission's current policy serves to advance these goals.

market in the next several years.").

C. Legal issues - regulatory classification of cable modem service.

ACA anticipates that able advocates from divergent perspectives will brief extensively the central legal issue in the open access debate: How is cable modem service classified under current law? ACA offers only a few remarks on this question.

1. Cable modem service might not fit into any current categories of regulated services.

As recognized by the NOI, the regulatory characterization of cable modem service has resulted in sharp divergence in the courts. Different courts have classified cable modem service as a "cable service",¹² not a "cable service",¹³ part "telecommunications service" and part "information service",¹⁴ solely "information service",¹⁵ and most recently, commercial speech protected by the First Amendment.¹⁶

¹² *MediaOne Group, Inc. v. County of Henrico*, 97 F.Supp. 2d 712,714 (E.D. Va. 2000), *appeal pending*, 4th Cir. No. 00-1680.

¹³ *AT&T v. City of Portland*, 216 F.3d 871, 877 (9th Cir. 2000).

¹⁴ *Id.*

¹⁵ *Gulf Power v. FCC*, 208 F.3d 1263, 1275-78 (11th Cir. 2000)

¹⁶ *Comcast Cablevision of Broward County et al. v. Broward County*, No. 99-6934 (S.D. Fl. November 8, 2000).

A recent analysis by Professor John Roberts of DePaul University Law School argues that confusion reigns because current law has not developed a category of regulated service into which cable modem service fits.

The fierce battle over "cable access" - whether cable companies should be required to allow competing Internet service providers direct access to cable modem platforms - raises serious statutory questions which the 1996 Act simply cannot answer. The issue, though now of great importance, was not anticipated or dealt with by the drafters.¹⁷

At least three Commission staff reports have reached similar conclusions.¹⁸

Conceivably, the Commission could agree with Professor Roberts and Commission staff reports on this issue. Rather than attempt to fit cable modem service into regulatory categories designed for entirely different services, the Commission can recognize that cable modem service is altogether different. A packet-switched service providing many evolving forms of interactive communication and content via Internet protocols over a cable platform might constitute an advanced service that stands apart from cable service, telecommunications service, or information service, and the related regulatory implications.

¹⁷ John C. Roberts, *The Sources of Statutory Meaning: An Archaeological Case Study of the 1996 Telecommunications Act*, 53 SMU L. Rev. 149 n. 26.

¹⁸ *Broadband Today*, 44 ("The findings of our Monitoring Sessions highlight the rapid pace of change in the nascent broadband industry and the difficulty of placing broadband services under any existing regulatory framework"); Oxman, 24-25 ("New technologies, while perhaps similar in appearance or in functionality, should not be stuffed into what may be ill-fitting regulatory categories in the name of regulation"); Barbara Espin, *Internet Over Cable: Defining the Future in Terms of the Past* (OPP Working Paper Series No. 30, 1998) 112 ("Application of existing regulatory categories is difficult, if not impossible to many forms of Internet-enabled communications").

2. Regardless of classification, the Commission should not impose regulatory burdens on cable modem service in smaller markets.

For ACA, the regulatory classification of cable modem service is less important than the consequences of that classification. In short, if the Commission proceeds to classify the service as one that is regulated under the Communications Act, and the Commission does not forbear its regulatory authority, the Commission must carve out broad exceptions for smaller market cable systems. If not, the regulations will bring a substantial risk of undercutting the progress of ACA members in delivering cable modem service in smaller markets. Ample authority exists for creating exceptions for independent cable companies.

We now turn to the questions raised in Section III.C. of the NOI.

D. The Commission's options.

Should the Commission continue its current approach?

For the markets served by ACA members - **yes**. The Commission should continue to allow independent cable businesses and others to develop marketplace solutions to deploy cable modem service in smaller markets. As the ACA Cable Modem Survey shows, the Commission's approach has fostered substantial progress in making high-speed Internet access available to hundreds of thousands of consumers in smaller markets and rural areas.

Should the Commission initiate a rulemaking?

For the markets served by ACA members - **no**. ACA recognizes that issues related to other industry and market sectors may drive the ultimate answer to this question. If the Commission proceeds with a rulemaking, it should remember that one size does *not* fit all. It should include proposals to exempt independent cable companies from regulations aimed at larger companies and larger markets.

Should the Commission exercise its forbearance authority?

For the markets served by ACA members - **yes**. As shown by the ACA Cable Modem Survey, the marketplace is working in smaller markets. As expressed by the Cable Service Bureau, "A finding of market-based harm . . . would be a necessary predicate for regulatory action."¹⁹ No evidence of market-based harm exists in markets served by ACA members. The imposition of burdensome Title II regulations, local

¹⁹ *Broadband Today*, 47.

franchise regulation, or other regulations would upend business models, erode incentives to invest, and stall progress in deployment of cable modem service.

III. CONCLUSION

ACA recognizes that much of the debate engendered by the NOI will focus on large companies and large markets. ACA asks the Commission to resist letting that debate overshadow the important progress of ACA members in deploying cable modem service in smaller markets. As shown by the ACA Cable Modem Survey, the Commission's policy of regulatory restraint is working well in smaller markets.

If the Commission concludes that concerns with larger markets and larger companies warrant the imposition of mandated open access regulations, it should propose broad exemptions from those regulations for independent cable companies serving smaller markets.

Respectfully submitted,

AMERICAN CABLE ASSOCIATION

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ACA Cable Modem Survey
as of October 2000

TABLE 1

ACA members currently providing cable modem services

Company and System Data

Companies	Total Cable Customers	Franchise Areas	Approximate Homes Passed
38	1,645,694	3,053	2,530,000

Cable Modem Service (CMS) Data

Franchise Areas Served	Homes Passed	% of total homes passed	CMS Customers	Penetration
355	839,748	33%	38,647	4.6%

Cable Modem Service (CMS) Data cont.

Investment in plant upgrades and equipment	CMS through unaffiliated ISP	CMS through affiliated ISP
about \$300 million	27	10

Near Term Expansion Plans (next 12-24 months)

Additional homes passed	Total Projected Homes Passed by CMS	% of Total Homes Passed
824,000	1,663,748	65%

Principal reasons for making investment to provide CMS:

- The investment was necessary to remain competitive.
- The investment was necessary to respond to the marketplace.
- Business models showed that the investment would earn a satisfactory rate of return and provide incremental revenue.

ACA Cable Modem Survey
as of October 2000

TABLE 2

**ACA members planning to launch cable modem services
within next 12-24 months**

Company Data

Companies	Total Cable Customers	Franchise Areas	Approximate Homes Passed
36	69,367	167	99,000

Near Term Expansion Plans (next 12-24 months)

Homes Passed	% of Total Homes Passed	CMS planned through unaffiliated ISP	CMS planned through affiliated ISP	Undecided on ISP
54,515	55%	14	14	8

ACA Cable Modem Survey
as of October 2000

TABLE 3

ACA members not planning to provide cable modem services

Company Data

Companies	Total Cable Customers	Franchise Areas	Approximate Homes Passed
34	59,774	181	92,000

Main Reasons For Not Providing CMS:

- Cost -- 17 members
- Affiliated with telephone company offering or considering DSL – 7 members
- System size/customer base too small – 4 members
- Selling company – 3 members

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